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April 11A, 2003

**EX PARTE**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Re: WC Docket No. 03-11 - Application by Qwest Communications International Inc. for Authority to Provide In-Region InterLATA Services in New Mexico, Oregon and South Dakota**

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this letter at the request of Commission staff to respond to WorldCom's recent *ex parte* filing regarding Qwest's OSS and EDI development.<sup>1</sup>

Virtually all of the issues identified by WorldCom have already been raised – and responded to by Qwest – in this proceeding.<sup>2</sup> The only new allegations made by WorldCom pertain to Event Notifications that Qwest issued in connection with its recent EDI release (version 12.0), the BOS bill format, and the Daily Usage File ("DUF"). But WorldCom does not provide any evidence that these Event Notifications have affected – or will affect – its ability to compete in the marketplace for local service. Event Notifications are a defined part of the Change Management Process, which was created in collaboration with the CLEC community, and are appropriately used to communicate information to CLECs relating to Qwest's systems.

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<sup>1</sup> See WorldCom April 10, 2003, Ex Parte, WC Docket No. 03-11 ("WorldCom April 10 Ex Parte).

<sup>2</sup> For instance, WorldCom again claims that "there simply is no evidence that . . . CLECs [have been] able to develop their interfaces smoothly without substantial problems." See *id.* at 4. But the same CLEC WorldCom identifies as needing to "hand-hold" orders, conduct "manual checks," and having taken "more than a year . . . to build its EDI interface" has acknowledged that it is able to submit residential orders via EDI without converting or modifying the data it receives through the pre-order process, and that it was able to develop its EDI interface on its own using Qwest's documentation. See Confidential Attachment A. WorldCom also alleges that another CLEC submitting orders via EDI *may* have received "access to technical help that was unavailable to other CLECs" See *id.* But Qwest follows the same technical support process for all CLECs, and there is no evidence in the record to support allegations to the contrary.

WorldCom identified two Event Notifications issued in connection with EDI version 12.0.<sup>3</sup> The first of these Event Notifications (6199861) informed CLECs that they may receive rejects when they request certain LPIC/PIC entries. The reason this Event Notification was issued is because the list used to edit the LPIC/PIC field does not include those IXCs that require the end user to contact them directly before initiating service. But this will have a minimal impact on CLECs because very few IXCs require end users to contact them directly before initiating service. Indeed, WorldCom's own LPIC/PIC are listed and thus are not affected by this issue. The second Event Notification (6198464) – which stated that CLECs may receive LSR rejects when deleting the ESX (call waiting) USOC on a residential account – is equally minor because a fix for it has already been targeted for April 19, 2003.<sup>4</sup>

The BOS Event Notification (6196218) that WorldCom cites – which informed CLECs that they may not receive end user TNs related to service order activities for UNE-P accounts produced in BOS format – also is minor because the TN field is not a required field (based on Telcordia industry standards) on the Other Charges and Credits (“OC&C”) record that Qwest includes in its BOS bills. The reason Telcordia does not require the TN field to be populated in the OC&C record is because CLECs already have the information they need to bill their end users based on the service order numbers that appear on their BOS bill. Thus, even though CLECs may not receive TNs from Qwest, they can still bill their end users pursuant to industry standards.

With respect to the three DUF-related Event Notifications cited by WorldCom, the issues pertaining to two of these Event Notifications (6195261 and 6195278) were already identified and discussed by Qwest in an earlier *ex parte*.<sup>5</sup> The only Event Notification that is new here is the one informing CLECs that they may receive incorrectly formatted records for long duration calls (6193072). But, after investigating five recent (April 4-10) WorldCom DUFs – which contained over one million records – in all three Qwest regions, Qwest determined that less than 0.02% of all WorldCom records were affected by this issue. Clearly, the issuance of these Event Notifications in the ordinary course do not reflect significant system defects, and, like the other issues raised by WorldCom, should not affect a finding that Qwest's OSS and EDI development meet the requirements of Section 271.

The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,

/s/

Melissa Newman

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<sup>3</sup> See WorldCom April 10 Ex Parte at 5.

<sup>4</sup> Notably, WorldCom is not scheduled to migrate to EDI version 12.0 until after this fix is implemented.

<sup>5</sup> See Qwest April 3, 2003, Ex Parte, WC Docket No. 02-11 at 14-15 (6195261, pay-per-use feature codes) and 16-17 (6195278, “I CALLED”).

Marlene H. Dortch

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